### REMARKS

The claims remaining in the present application are Claims 1-21. Claims 1, 8, 11, 14, and 21 have been amended. No new matter has been added as a result of these claim amendments.

## CLAIM REJECTIONS

Claims 1-13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Mason et al., U.S. Patent No. 5,946,219 (hereinafter Mason) in view of Varadarajan et al., U.S. Patent No. 5,838,583 (hereinafter Varadarajan). The rejection is respectfully traversed for the reasons below.

# CLAIMS 1-7

Currently Amended Claim 1 reads:

A computer implemented method of generating an order of loading data into a programmable device comprising the steps of:

a) identifying a plurality of memory cells in a hierarchical schematic representation of an architecture of a programmable device for which a programming order is desired;

b) automatically determining a plurality of addresses corresponding

to said plurality of memory cells;

c) automatically determining a plurality of logical names for said

plurality of memory cells; and

d) based on an order in which said plurality of addresses are to be loaded into said programmable device, automatically storing said plurality of logical names for said plurality of memory cells within a data structure within computer readable memory, wherein said data structure describes an order in which to program said programmable device.

Claim 1 recites identifying a plurality of memory cells in a hierarchical schematic representation of an architecture of a programmable device for which a programming order is desired. Thus, the schematic representation is that of an

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architecture of the programmable device itself, as opposed to a user design implemented in a programmable device.

Mason fails to disclose or suggest identifying a plurality of memory cells in a hierarchical schematic representation of an architecture of a programmable device, as claimed. Rather, Mason discloses a process for implemented a user design in a FPGA. Mason describes steps that include starting with a design of one or more logic circuits that will be implemented within the FPGA (col. 2, lines 13-15). Mason discloses certain steps taken with respect to this user design. For example, in Figures 4 and 5 Mason discloses entering an initial design (that is to be implemented within the FPGA, as opposed to a design of the FPGA itself). Certain steps may be taken with respect to the user design, which is to be implemented within the FPGA. Thus, Mason is concerned with a user design implemented in an FPGA rather than a hierarchical schematic representation of an architecture of a programmable device programmable device, as claimed.

Varadarajan fails to remedy this deficiency in Mason. Thus, the combination of Mason and Varadarajan fail to teach or suggest the limitation of, "identifying a plurality of memory cells in a hierarchical schematic representation of an architecture of a programmable device for which a programming order is desired," as claimed. In contrast, Varadarajan is concerned with the automatic placement and routing of datapath functions (Abstract). For example, the operational flow shown in Figure 2 of Varadarajan begins after the circuit designer has specified the circuit in HDL, performed logic synthesis to produce a netlist, and after basic floorplanning has been done with the chip floorplanner (col. 7, lines 6-10).

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Varadarajan discloses that the basic schema of the circuit is modified to provide interactive floorplanning (col. 7, lines 20-27). Thus, Applicants understand Varadarajan to disclose modifying a representation of the <u>user's design</u>. However, Varadarajan fails to teach or suggest the <u>automatic generation</u> of an order to load data in a programmable device, based on a <u>schematic representation of the architecture of the programmable device itself</u>, as claimed.

For the foregoing rationale, the combination of Mason and Varadarajan fail to teach or suggest the limitations of Claim 1. Therefore, Applicants respectfully solicit the allowance of Claim 1.

Claims 2-7 and 21 depend from Claim 1, which is believed to be allowable.

As such, Claims 2-7 and 21 are believed to be allowable.

#### CLAIMS 8-13

#### Amended Claim 8 reads:

A computer implemented method of generating an order of loading data into a programmable logic device comprising the steps of:

- a) accessing a data structure comprising a plurality of logical names corresponding to a plurality of addresses in a hierarchical schematic representation of an architecture of a programmable logic device;
- b) accessing a data structure specifying an order in which said plurality of addresses are to be loaded into said programmable logic device;
- c) automatically ordering said plurality of logical names from step a) based on the order specified in said data structure in step b); and
- d) automatically storing said ordered plurality of logical names from step c) in a data structure within computer readable memory, wherein said ordered plurality of logical names describe an order of loading data into said programmable logic device.

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Claim 8 recites "accessing a data structure comprising a plurality of logical names corresponding to a plurality of addresses in a <u>hierarchical schematic</u> representation of an architecture of a programmable logic device."

For the reasons discussed in the response to Claim 1, the combination of Mason and Varadarajan fail to teach or suggest "accessing a data structure comprising a plurality of logical names corresponding to a plurality of addresses in a hierarchical schematic representation of an architecture of a programmable logic device," as claimed in Claim 8. Therefore, Applicants respectfully solicit the allowance of Claim 8.

Claim 8 further recites a limitation of <u>automatically ordering</u> said plurality of logical names from step a) based on the order specified in said data structure in step b). Claim 8 further recites, "<u>automatically storing</u> said ordered plurality of logical names from step c) in a data structure within computer readable memory, wherein said ordered plurality of logical names describe an order of loading data into said programmable logic device." Claim 8 thus recites an embodiment of a computer-implemented method in which an order for loading data into a programmable device is generated from a data structure <u>based on a hierarchical schematic representation of an architecture of a programmable logic device</u>.

Mason may purport to describe a bitstream compiler. However, for the reasons discussed in the response to Claim 1, Applicants do not understand the bitstream compiler to perform the <u>automatic ordering or the automatic storing</u>

<u>using a data structure that is a hierarchical schematic representation of an</u>

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<u>architecture of a programmable logic device</u>, as recited in Claim 8. Thus, Mason fails to teach or suggest the limitations of Claim 8.

Varadarajan fails to remedy this deficiency in Mason. Thus, the combination of Mason and Varadarajan fails to teach or suggest, "automatic ordering or the automatic storing using a data structure that is a hierarchical schematic representation of an architecture of a programmable logic device," as recited in Claim 8. Varadarajan is concerned with the automatic placement and routing of datapath functions (Abstract). For example, the operational flow shown in Figure 2 of Varadarajan begins after the circuit designer has specified the circuit in HDL, performed logic synthesis to produce a netlist, and after basic floorplanning has been done with the chip floorplanner (col. 7, lines 6-10). Varadarajan discloses that the basic schema of the circuit is modified to provide interactive floorplanning (col. 7, lines 20-27). Thus, Applicants understand Varadarajan to disclose modifying a representation of the <u>user's design</u>. However, Varadarajan fails to teach or suggest the <u>automatic generation</u> of an order to load data in a programmable device, based on a <u>schematic representation of an architecture of the programmable device itself</u>, as claimed.

For the foregoing rationale, Claim 8 is not rendered obvious over Mason in view of Varadarajan. Therefore, allowance of Claim 8 is respectfully requested.

Claims 9-13 depend from Claim 8. As Claim 8 is respectfully believed to be allowable, allowance of Claims 9-13 is respectfully solicited.

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**CLAIMS 14-20** 

Claims 14-21 are rejected under 35 U.S.C. 103(a) as being unpatentable

over Mason. The rejection is respectfully traversed for the reasons below.

Amended Claim 14 recites, in part:

identifying a plurality of memory cells in a hierarchical schematic

representation of an architecture of a programmable device for which a

programming order is desired

For the reasons discussed with respect to Claim 1, Mason does not teach or

suggest the limitation, "identifying a plurality of memory cells in a hierarchical

schematic representation of an architecture of a programmable device for which a

programming order is desired," as claimed in Claim 14. For this reason, Claim 14 is

patenable over Mason.

For the following further reasons, Claim 14 is additionally patenable over

Mason. Claim 14 further recites that a plurality of addresses and logical names are

automatically determined for the plurality of memory cells. Claim 14 also recites,

"based on an order in which said plurality of addresses are to be loaded into said

programmable logic device, automatically storing said plurality of logical names for

said plurality of memory cells within a data structure within computer readable

memory." Thus, the order of loading data into the programmable device is

determined automatically, based on a hierarchical schematic representation of an

architecture of a programmable device.

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Mason may describe generating a configuration bitstream from a design database, using a bitstream compiler (col. 6, lines 23-33). In this fashion, the FPGA may be programmed to implement the user design. However, it is Applicants' understanding that the bitstream compiler is a computer program that was written manually. Such manual generation of a bitstream compiler is very tedious and is subject to errors. Errors in the manual coding of the bitstream compiler can appear to be errors in the user's design that is to be implemented in the programmable device (Specification, page 1, line 23 – page 2, line 8.). Applicants do not understand the Mason to teach or suggest <u>automatically</u> generating an order in which to program a programmable device using a hierarchical schematic representation of an architecture of the programmable device, as claimed.

For the foregoing rationale, it is respectfully submitted that Claim 14 is not taught or suggested by Mason. Thus, allowance of Claim 14 is earnestly solicited.

Therefore, allowance of Claims 14 is respectfully requested. Claims 15-20 depend from Claim 14, respectively. As Claim 14 is respectfully believed to be allowable, allowance of Claims 15-20 is respectfully solicited.

#### CONCLUSION

In light of the above listed amendments and remarks, reconsideration of the rejected Claims is requested. Based on the arguments and amendments presented above, it is respectfully submitted that Claims 1-21 overcome the rejections of record. Therefore, allowance of Claims 1-21 is earnestly solicited.

Serial No. 09/684,160 Examiner: Hamilton, M.G. Should the Examiner have a question regarding the instant amendment and remarks, the Applicants invites the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

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